

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

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NOV 21 2007

MICHAEL W. DOBBINS
CLERK, U.S. DISTRICT COURT

CHRISTOPHER GROOMS,
EDDIE BRANTLEY,
STANLEY HUNTER,
UYLONDA HENDERSON, and
ALLISAH LOVE

Plaintiffs,

v.

CITY OF CHICAGO POLICE OFFICERS
DAVID TENCZA, #9203,
MICHELLE WANTUCK, #19973,
SERGEANT JOHN LEE, #909, and
THE CITY OF CHICAGO,

Defendants.

Case No. 07C 6176

Judge Andersen

Magistrate Judge Valdez

Jury Demanded

NOTICE OF MOTION

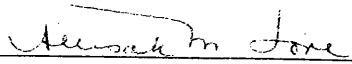
TO:	City of Chicago Police Officers: David Tencza, #9203 Michelle Wantuck, #19973 Sergeant John Lee, #909 City of Chicago Police Headquarters 3510 South Michigan Avenue Chicago, Illinois 60653	The City of Chicago c/o The City of Chicago Corporation Counsel 30 N. LaSalle Street, Suite 1020 Chicago, Illinois 60602
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On Thursday, November 29, 2007, at 9 a.m. or as soon thereafter as counsel may be heard, I shall appear before the Honorable Wayne R. Andersen in Courtroom 1403 at the United States District Court, Northern District of Illinois, Eastern Division, 219 South Dearborn Street, Chicago, Illinois; and present a **MOTION FOR AN EMERGENCY APPEARANCE, a MOTION TO PRESERVE 911 INTAKE CALLS, DISPATCH TAPES AND EVENT ENTRIES VIA COMPUTER FROM THE OEMC, TAPES OF INTAKE CALLS AND EVENT ENTRIES VIA COMPUTER FROM OPS, AND SECURITY VIDEO/TAPES FROM THE CITY OF CHICAGO AUTO POUND, and a MOTION TO AMEND COMPLAINT.**

Allisah Love
P.O. Box 4853
Chicago, Illinois 60680
(312) 756-9329

PROOF OF SERVICE

I, the undersigned plaintiff, certify that on the 21st day of November, 2007, I served a copy of this notice to each person to whom it is directed by way of hand delivery and/or U.S. Mail before the hour of 5 pm.


Signature/Certification

21 November 2007
Date

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MOTION FOR AN EMERGENCY APPEARANCE

1. Now comes the Plaintiff Allisah Love, requesting an Emergency Appearance before the Honorable Wayne R. Andersen in order to present time sensitive motions that will directly affect and influence the upcoming and previously scheduled status hearing for case number 07C 6176 on January 10, 2008 at 9 a.m. or shortly thereafter. The following substantiates Plaintiff's request:

2. Plaintiffs MOTION TO PRESERVE 911 INTAKE CALLS, DISPATCH TAPES AND EVENT ENTRIES VIA COMPUTER FROM THE OEMC, TAPES OF INTAKE CALLS AND EVENT ENTRIES VIA COMPUTER FROM OPS, AND SECURITY VIDEO/TAPES FROM THE CITY OF CHICAGO AUTO POUND must be done in a time frame that precedes the previously schedules status hearing for federal court case number 07C 6176.

3. Plaintiffs MOTION TO AMEND COMPLAINT is paramount, not only to include the incident of retaliation against Plaintiff Allisah Love that took place on November 20, 2007, but also as all Plaintiffs seek to secure counsel for representation in this court case.

WHEREFORE, Plaintiffs respectfully requests that this court grant Plaintiff's MOTION FOR AN EMERGENCY HEARING before the Honorable Wayne R. Anderson.

Respectfully Submitted on behalf
of all Plaintiffs,



Allisah Love
Pro se Plaintiff

Allisah Love
P.O. Box 4853
Chicago, Illinois 60680
(312) 756-9329

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**PLAINTIFFS MOTION TO PRESERVE 911 INTAKE CALLS, DISPATCH TAPES AND
EVENT ENTRIES VIA COMPUTER FROM THE OEMC, TAPES OF INTAKE CALLS
AND EVENT ENTRIES VIA COMPUTER FROM OPS, AND SECURITY
VIDEO/TAPES FROM THE CITY OF CHICAGO AUTO POUND**

1. Now comes the Plaintiff Allisah Love, requesting that this honorable court grant her motion to preserve the following: intake calls, dispatch tapes and event entries via computer from the City of Chicago Office of Emergency Management and Communications (OEMC); tapes of intake calls to The City of Chicago Office of Professional Standards (OPS); and Security Video/Tapes from the City of Chicago Auto Pound located at 10301 South Doty Avenue in Chicago. The following substantiates Plaintiffs request:

2. On November 20, 2007, Plaintiff Allisah Love was arrested on false charges by members of the City of Chicago Police Department while attempting to assist Plaintiff Uylonda Henderson in the retrieval of her vehicle at the City of Chicago Auto Pound located at 10301 South Doty Avenue.

3. The arrest of Plaintiff Allisah Love was an act of retaliation against her for prior complaints against the City of Chicago Police Department and for her involvement in federal case number 07C 6176, which was filed after the false arrest of her brother, Plaintiff Christopher Grooms and the unlawful search, seizure, detention and vehicle impoundment that he and the other Plaintiffs involved in this case endured.

4. Plaintiff Allisah Love contends that this motion is very time sensitive in regard to the preserving electronic communication that can make clear the events that transpired in the above named incident November 20, 2007 which resulted in her false arrest. This request for preservation is vital to Plaintiff's case. 911 tapes must be requested within 30 days of the incident for which they are requested.

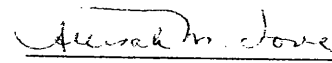
5. Plaintiff Allisah Love is requesting that the 911 intake calls, dispatch tapes and event entries via computer from the OEMC be preserved for the address of 10301 South Doty Avenue for the date of November 20, 2007, and for the phone numbers (312) 756-9329 and (312) 420-5054.

6. Plaintiff Allisah Love is also requesting that the intake calls and event entries via computer from OPS be preserved for the address of 10301 South Doty Avenue for the date of November 20, 2007, and for the phone numbers (312) 756-9329 as well as any calls made to OPS that same evening from the OEMC.

7. Plaintiff Allisah Love further requests that the security video/tapes from the City of Chicago Auto Pound located at 10301 South Doty Avenue for the date of November 20, 2007 be preserved; especially those retrieved from inside of the main trailer where people must go to process the paperwork for the release of their vehicle.

WHEREFORE, Plaintiff respectfully requests that this honorable court grant PLAINTIFFS MOTION TO PRESERVE 911 INTAKE CALLS, DISPATCH TAPES AND EVENT ENTRIES VIA COMPUTER FROM THE OEMC, TAPES OF INTAKE CALLS AND EVENT ENTRIES VIA COMPUTER FROM OPS, AND SECURITY VIDEO/TAPES FROM THE CITY OF CHICAGO AUTO POUND.

Respectfully Submitted on
behalf of all Plaintiffs,


Allisah Love
Pro se Plaintiff

Christopher Grooms
P.O. Box 490136
Chicago, Illinois 60649

Eddie Brantley
1110 W. 50th Street, Apt. NN
Chicago, Illinois 60609

Stanley Hunter
5001 S. Morgan
Chicago, Illinois 60609

Uylonda Henderson
335 W. 91st Street
Chicago, Illinois 60620

Allisah Love
P.O. Box 4853
Chicago, Illinois 60680

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PLAINTIFFS MOTION TO AMEND COMPLAINT

1. Now come the Plaintiffs Christopher Grooms, Eddie Brantley, Stanley Hunter, Uylonda Henderson, and Allisah Love; requesting that this honorable court grant their MOTION TO AMEND COMPLAINT and providing the following to substantiate such request:

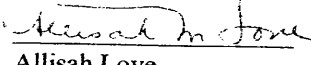
2. Plaintiffs MOTION TO AMEND COMPLAINT is paramount, in order to include the incident of retaliation against Plaintiff Allisah Love, which took place on November 20, 2007; and now adds six more City of Chicago Police Officers from the 4th District as Defendants in this case for which their information must be provided: Officers Muhammad, Houston, Fisher, Glenn, Sutter and McMahon.

3. Plaintiffs MOTION TO AMEND COMPLAINT is also paramount as they secure proper counsel for representation in this matter.

4. Plaintiffs request a time frame of three weeks up until and including the date of December 13, 2007 in which to file their amended complaint in the United States District Court for the Northern District of Illinois, Eastern Division, and provide copies for Defendants.

WHEREFORE, Plaintiff respectfully requests that this honorable court grant PLAINTIFFS MOTION TO AMEND COMPLAINT.

Respectfully Submitted on behalf
of all Plaintiffs,


Allisah Love
Pro se Plaintiff

Allisah Love
P.O. Box 4853
Chicago, Illinois 60680